



April 13, 2015

Mr. Jeff Schultz  
ConAgra Foods  
554 S. Yosemite Ave  
Oakdale, CA 95361

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-1976  
Project # N-1151309**

Dear Mr. Schultz:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct permit N-1976-6-11 (under project N-1150189) into the Title V operating permit. This permit was to designate a 184 MMBtu/hr natural gas-fired boiler as dormant emission unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct permit N-1976-6-11, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

  
Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

**Sayed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

## **Title V APPLICATION REVIEW Minor Modification**

**Facility Number:** N-1976  
**Facility Name:** ConAgra Foods  
**Mailing Address:** 554 S. Yosemite Ave  
Oakdale, CA 95361

**Contact Name:** Jeff Schultz  
**Phone:** (209) 847-0321

**Responsible Official:** Kent Harker  
**Title:** Interim Plant Manager

**Processing Staff:** Jag Kahlon  
**Project Number:** N-1151309  
**Date:** April 10, 2015

### **I. PROPOSAL**

ConAgra Foods has proposed to incorporate Authority to Construct (ATC) permit N-1976-6-11 (issued under project N-1150189) into their Title V operating permit. This permit was to designate a 184 MMBtu/hr natural gas-fired boiler as dormant emission unit.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for permit requirements.

### **II. FACILITY LOCATION**

This facility is located at 554 S. Yosemite Ave, Oakdale, California.

### **III. EQUIPMENT DESCRIPTION**

184 MMBTU/HR BABCOCK & WILCOX MODEL FM117-97 NATURAL GAS-FIRED BOILER #2 WITH A TODD RAPID MIX ULTRA LOW NOX BURNER, INDUCED FLUE GAS RECIRCULATION (FGR), AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

The permitting action under which the ATC N-1976-6-11 was issued did not trigger an SB-288 or Federal major modifications, and neither the permitting action relaxed any existing monitoring, recordkeeping, or reporting requirements. Therefore, public review is not required for this project.

**V. APPLICABLE REQUIREMENTS**

Rule 2520 Federally Mandated Operating Permits (6/21/01)

**VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

The following conditions were included in ATC N-1976-6-11 in addition to the requirements in Permit to Operate N-1976-6-10.

- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520]
- While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2201]
- While dormant, normal source testing shall not be required. [District Rule 2080]
- Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
- Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
- Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]

The following requirement is included in the permit being issued under this project:

- Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]

All the above requirements are now Federally Enforceable through Title V permit.

Note that the applicant has already submitted a Title V package (TV Form 008 and 009) to incorporate ATC into Title V permit. Therefore, the first condition listed in the ATC will not be included in the permit being issued under this project.

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act;
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix III).

Compliance is expected with this Rule.

**APPENDICES**

Appendix I:	Proposed Title V Operating Permit
Appendix II:	Copy of Authority to Construct Permit
Appendix III:	Permit Application
Appendix IV:	Emissions Change
Appendix V:	Current Permits to Operate

Appendix I  
Proposed Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1976-6-14

**EXPIRATION DATE:** 07/31/2017

**EQUIPMENT DESCRIPTION:**

184 MMBTU/HR BABCOCK & WILCOX MODEL FM117-97 NATURAL GAS-FIRED BOILER #2 WITH A TODD RAPID MIX ULTRA LOW NOX BURNER, INDUCED FLUE GAS RECIRCULATION (FGR), AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

## PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
2. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
7. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
10. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
12. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201, 4301, and 4320] Federally Enforceable Through Title V Permit
14. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
15. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [District Rule 4001] Federally Enforceable Through Title V Permit
16. This unit shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
17. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
18. Emission rates from the unit shall not exceed 0.10 lb-NO<sub>x</sub>/MMBtu at any time, including periods of startup, shutdown, or malfunction. Compliance with this shall be determined by the EPA-approved alternate monitoring plan for this permit unit. [District Rule 4001 and 40 CFR 60.44b] Federally Enforceable Through Title V Permit
19. Except during start-up and shutdown, emissions from this unit shall not exceed any of the following limits: 5 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0062 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.001 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. During start-up and shutdown emissions from this unit shall not exceed any of the following limits: 80 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0971 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 200 ppmvd CO @ 3% O<sub>2</sub> or 0.146 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. The ammonia emissions from the exhaust of the SCR system serving this boiler shall not exceed 10 ppmvd @ 3% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The flue gas recirculation system shall be in operation at all times when the boiler is firing. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The flue gas recirculation valve setting shall be monitored and recorded on a daily basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
24. The flue gas recirculation valve setting shall not be less than 61% at firing rates greater than 62%. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
25. Normal range or level for the flue gas recirculation valve settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
26. If the flue gas recirculation valve setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



27. The permittee shall maintain records of the date and time of flue gas recirculation valve settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve setting within the acceptable range. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
28. Total duration of startup and shutdown shall not exceed 4 hr/day, combined. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. Total duration of startup and shutdown shall not exceed 462.5 hr/year, combined. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> at least once during each month in which source testing is not performed. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH<sub>3</sub> monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. If the NO<sub>x</sub>, CO or NH<sub>3</sub> concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. All NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO<sub>x</sub>, CO and O<sub>2</sub> analyzer as well as the NH<sub>3</sub> emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
34. Ammonia emission readings shall be conducted at the time the NO<sub>x</sub>, CO and O<sub>2</sub> readings are taken. The readings shall be converted to ppmvd @ 3% O<sub>2</sub>. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub>, CO and NH<sub>3</sub> concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH<sub>3</sub> emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
36. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

37. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
39. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
40. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
41. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
43. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
44. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
45. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
46. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
47. Daily records of start-up and shutdown durations and number of occurrences of each shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
48. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix II  
Copy of Authority to Construct Permit



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

  
**HEALTHY AIR LIVING™**

**COPY**

## **AUTHORITY TO CONSTRUCT**

**PERMIT NO:** N-1976-6-11

**ISSUANCE DATE:** 03/03/2015

**LEGAL OWNER OR OPERATOR:** CONAGRA FOODS  
**MAILING ADDRESS:** ATTN: REGIONAL ENVIRONMENTAL MANAGER  
554 S YOSEMITE AVENUE  
OAKDALE, CA 95361

**LOCATION:** 554 S YOSEMITE AVE  
OAKDALE, CA 95361

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF: 184 MMBTU/HR BABCOCK & WILCOX MODEL FM117-97 NATURAL GAS-FIRED BOILER #2 WITH A TODD RAPID MIX ULTRA LOW NOX BURNER, INDUCED FLUE GAS RECIRCULATION (FGR), AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM: TO DESIGNATE AS COMPLIANT DORMANT EMISSION UNIT

### **CONDITIONS**

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2201]
3. While dormant, normal source testing shall not be required. [District Rule 2080]
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]
7. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
Arnaud Marjollet, Director of Permit Services  
N-1976-6-11 Mar 3 2015 1:51PM - KAYLOW : Joint Inspection NOT Required

8. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
10. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
13. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201, 4301, and 4320] Federally Enforceable Through Title V Permit
14. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
15. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [District Rule 4001] Federally Enforceable Through Title V Permit
16. This unit shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
17. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
18. Emission rates from the unit shall not exceed 0.10 lb-NOx/MMBtu at any time, including periods of startup, shutdown, or malfunction. Compliance with this shall be determined by the EPA-approved alternate monitoring plan for this permit unit. [District Rule 4001 and 40 CFR 60.44b] Federally Enforceable Through Title V Permit
19. Except during start-up and shutdown, emissions from this unit shall not exceed any of the following limits: 5 ppmvd NOx @ 3% O<sub>2</sub> or 0.0062 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.001 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. During start-up and shutdown emissions from this unit shall not exceed any of the following limits: 80 ppmvd NOx @ 3% O<sub>2</sub> or 0.0971 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 200 ppmvd CO @ 3% O<sub>2</sub> or 0.146 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. The ammonia emissions from the exhaust of the SCR system serving this boiler shall not exceed 10 ppmvd @ 3% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The flue gas recirculation system shall be in operation at all times when the boiler is firing. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The flue gas recirculation valve setting shall be monitored and recorded on a daily basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
24. The flue gas recirculation valve setting shall not be less than 61% at firing rates greater than 62%. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. Normal range or level for the flue gas recirculation valve settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
26. If the flue gas recirculation valve setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records of the date and time of flue gas recirculation valve settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve setting within the acceptable range. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
28. Total duration of startup and shutdown shall not exceed 4 hr/day, combined. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. Total duration of startup and shutdown shall not exceed 462.5 hr/year, combined. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> at least once during each month in which source testing is not performed. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH<sub>3</sub> monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. If the NO<sub>x</sub>, CO or NH<sub>3</sub> concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. All NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO<sub>x</sub>, CO and O<sub>2</sub> analyzer as well as the NH<sub>3</sub> emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. Ammonia emission readings shall be conducted at the time the NO<sub>x</sub>, CO and O<sub>2</sub> readings are taken. The readings shall be converted to ppmvd @ 3% O<sub>2</sub>. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub>, CO and NH<sub>3</sub> concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH<sub>3</sub> emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
36. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
37. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
39. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
40. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
41. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
43. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
44. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
45. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
46. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
47. Daily records of start-up and shutdown durations and number of occurrences of each shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
48. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

Appendix III  
Permit Application





# San Joaquin Valley Air Pollution Control District

www.valleyair.org



## Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT    [X] MINOR MODIFICATION    [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>ConAgra Foods</b>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <b>554 S. Yosemite Avenue</b>  CITY: <b>Oakdale</b> STATE: <b>California</b> 9-DIGIT ZIP CODE: <b>93561</b>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <b>554 S. Yosemite Avenue</b> CITY: <b>Oakdale</b>  ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <b>Food Processing</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  MODIFY TITLE V PERMIT TO INCORPORATE THE FOLLOWING ATC:  N-1976-6-11 MODIFICATION OF: 184 MMBTU/HR BABCOCK & WILCOX MODEL FM 117-97 NATURAL GAS FIRED BOILER #2 WITH A TODD RAPID MIX ULTRA LOW NOX BURNER, INDUCED FLUE GAS RECIRCULATION (FGR) AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM: TO DESIGNATE AS COMPLIANCE DORMANT EMISSION UNIT	
6. TYPE OR PRINT NAME OF APPLICANT:  <b>Kent Harker</b>	TITLE OF APPLICANT:  <b>Interim Plant Manager</b>
7. SIGNATURE OF APPLICANT:  	DATE: <b>4/9/2015</b>  PHONE: <b>209-848-7279 (Rick Mueller)</b> EMAIL: <b>kendrick.mueller@conagrafoods.com</b>

For APCD Use Only:

DATE STAMP  <b>APR - 9 2015</b>  <b>SJVAPCD NORTHERN REGION</b>	FILING FEE RECEIVED: \$ <b>0</b> CHECK#: _____  DATE PAID: _____  PROJECT NO: <b>N1151309</b> FACILITY ID: <b>N-1976</b>
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San Joaquin Valley  
Unified Air Pollution Control District



**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- ☐ SIGNIFICANT PERMIT MODIFICATION  
☒ MINOR PERMIT MODIFICATION
- ☐ ADMINISTRATIVE  
AMENDMENT

COMPANY NAME: <b>ConAgra Foods</b>	FACILITY ID: <b>N- 1976</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <b>ConAgra Foods</b>	
3. Agent to the Owner: <b>Kent Harker, Interim Plant Manager</b>	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:

*Kent M. Harker*

Signature of Responsible Official

4/9/2015

Date

**Kent Harker**

Name of Responsible Official (please print)

**Interim Plant Manager**

Title of Responsible Official (please print)

## Appendix IV Emissions Change

## Emissions Change

This project does not result in any emission changes.

Appendix V  
Current Permit to Operate

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1976-6-10

**EXPIRATION DATE:** 07/31/2017

**EQUIPMENT DESCRIPTION:**

184 MMBTU/HR BABCOCK & WILCOX MODEL FM117-97 NATURAL GAS-FIRED BOILER #2 WITH A TODD RAPID MIX ULTRA LOW NOX BURNER, INDUCED FLUE GAS RECIRCULATION (FGR), AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
7. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201, 4301, and 4320] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [District Rule 4001] Federally Enforceable Through Title V Permit
10. This unit shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
11. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
12. Emission rates from the unit shall not exceed 0.10 lb-NOx/MMBtu at any time, including periods of startup, shutdown, or malfunction. Compliance with this shall be determined by the EPA-approved alternate monitoring plan for this permit unit. [District Rule 4001 and 40 CFR 60.44b] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Except during start-up and shutdown, emissions from this unit shall not exceed any of the following limits: 5 ppmvd NOx @ 3% O2 or 0.0062 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.001 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. During start-up and shutdown emissions from this unit shall not exceed any of the following limits: 80 ppmvd NOx @ 3% O2 or 0.0971 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 200 ppmvd CO @ 3% O2 or 0.146 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. The ammonia emissions from the exhaust of the SCR system serving this boiler shall not exceed 10 ppmvd @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The flue gas recirculation system shall be in operation at all times when the boiler is firing. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The flue gas recirculation valve setting shall be monitored and recorded on a daily basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
18. The flue gas recirculation valve setting shall not be less than 61% at firing rates greater than 62%. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
19. Normal range or level for the flue gas recirculation valve settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
20. If the flue gas recirculation valve setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the date and time of flue gas recirculation valve settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve setting within the acceptable range. [District Rules 4305, 4306, 4320 and 40 CFR 64] Federally Enforceable Through Title V Permit
22. Total duration of startup and shutdown shall not exceed 4 hr/day, combined. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. Total duration of startup and shutdown shall not exceed 462.5 hr/year, combined. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> at least once during each month in which source testing is not performed. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH<sub>3</sub> monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. If the NO<sub>x</sub>, CO or NH<sub>3</sub> concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. All NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO<sub>x</sub>, CO and O<sub>2</sub> analyzer as well as the NH<sub>3</sub> emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. Ammonia emission readings shall be conducted at the time the NO<sub>x</sub>, CO and O<sub>2</sub> readings are taken. The readings shall be converted to ppmvd @ 3% O<sub>2</sub>. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub>, CO and NH<sub>3</sub> concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH<sub>3</sub> emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
34. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



35. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
37. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
38. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
39. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
40. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
41. Daily records of start-up and shutdown durations and number of occurrences of each shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
42. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.